

EXHIBIT I



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 18, 2015

BY EMAIL

Albert Dayan, Esq.
8002 Kew Gardens Rd., Suite 902
Kew Gardens, NY 11415

**Re: United States v. Flaviu Georgescu,
14 Cr. 799 (RA)**

Dear Mr. Dayan:

This letter provides additional information consistent with our ongoing obligations pursuant to Federal Rule of Criminal Procedure 16.

On or about December 19, 2014, December 29, 2014, January 21, 2015 and February 17, 2015, representatives of the U.S. Government met with Flaviu Georgescu at Spoz prison in Podgorica, Montenegro.

During some of these meetings, Georgescu claimed that, several years ago, he had volunteered information to the FBI about international organized crime and arms dealing. Georgescu stated, however, that the FBI did not continue meeting with him. Georgescu then stated that he decided to pursue his own collection operations "on behalf of" the CIA and FBI, and that he had collected much information over the years. He said that he was ready to present this information in the name of protecting American citizens and the U.S.

Georgescu gave his U.S. citizenship oath, with the phrase "against all enemies, foreign and domestic" underlined. Georgescu then claimed again that his activities with arms dealers were aimed at collecting information on criminals who would harm the U.S.

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Georgescu also spoke about his (Georgescu's) identity as an American citizen and the importance of his citizenship responsibilities. Georgescu stressed that he was engaging in the arms deal as a favor to the U.S. Government in order to collect what Georgescu considered to be important evidence against people who were trying to harm the U.S. Georgescu also stated that he was lonely in prison, though his wife visited him once every two to three weeks.

Respectfully submitted,

PREET BHARARA
United States Attorney

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